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March 31, 2015

VIA E-FILE

Magistrate Judge Judith C. McCarthy
United States District Court for the
Southern District of New York
Courtroom 421
300 Quarropas Street
White Plains, NY 10601

Re: Justin T. Maher v. Quality Bus Service, LLC and Caitlin Railo
Docket No. 14 CV 3586 (JCM)
Our File No.: 19176

Dear Judge McCarthy:

As you may recall, the parties took the deposition of Defendant Caitlin H. Railo at Taconic Correctional Facility on March 26, 2015. During her deposition, Defendant Railo indicated that at the time she was hired by Defendant Quality Bus Service, LLC, she was taking several prescription medications, prescribed by her primary care physician, Viviana Galli, MD, and filled at either the Medicine Shoppe Pharmacy or Aliton's Pharmacy. Defendant Railo also indicated that she suffered from brain damage and seizures which were diagnosed and treated at Middletown Hospital (presently Orange Regional Medical Center). Defendant Railo previously provided one (1) medical authorization to obtain records from Crystal Run Healthcare, where she had received treatment for gynecological conditions.

In an effort to avoid any delay in obtaining additional medical authorizations, at the conclusion of her deposition, undersigned counsel made a request that Defendant Railo execute medical authorizations allowing Plaintiff to obtain records from Dr. Galli, Aliton's Pharmacy, the Medicine Shoppe Pharmacy, and Middletown Hospital/Orange Regional Medical Center at the conclusion of her deposition. However, Attorney LaRose advised that he would not permit Defendant Railo to provide any additional medical authorizations absent an order from the Court requiring the same.

The parties were unable to complete Defendant Railo's deposition on March 26, 2015, and have agreed to conclude the same on April 13, 2015. In order to avoid any further delays in obtaining executed medical authorizations from Defendant Railo, I would respectfully request

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that this Honorable Court issue an Order directing Defendant Railo to provide executed medical authorizations directed to Viviana Galli, MD, the Medicine Shoppe Pharmacy, Aliton's Pharmacy, and Middletown Hospital/Orange Regional Medical Center at her deposition on April 13, 2015.

Thank you in advance for your continued attention and dedication to the expedient resolution of this matter.

Very truly yours,



VINCENT S. CIMINI

VSC:sl

cc: Justin T. Maher
Michael E. Catalinotto, Jr., Esquire
Keith V. LaRose, Esquire
Evan M. Foulke, Esquire